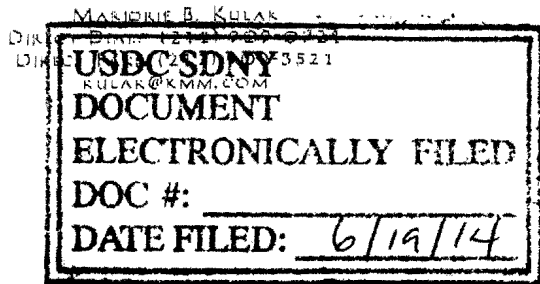


**MEMO ENDORSED****KM&M**

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June 19, 2014

**VIA FACSIMILE (212) 805-6724**Hon. Frank Maas  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 740  
New York, New York 10007

*Rather than rescheduling the conference, I would prefer that counsel execute a thirty-day order discontinuing the case without prejudice subject to reinstatement within thirty*

Re: *Payano v. CompassRock Real Estate LLC, et al.; days upon*  
13-cv-7967 (DLC)(FM) *letter request. The form that*  
KM&M File No. 11889.0015

Dear Judge Maas: *Counsel customarily use in my cases is available on my webpage on the Court's internet*

Our firm is counsel to Defendants CompassRock Real Estate LLC *internet*  
("CompassRock") and Resource Management, Inc. ("RMI") in the referenced matter. *site.*

The parties are scheduled to appear before Your Honor on June 25, 2014 *if the*  
at 10:30 a.m. for a settlement conference in Courtroom 20A, 500 Pearl Street, New *case*  
York, New York 10007. The parties have recently reached an agreement to settle this *then*  
matter in principle, and will be negotiating a settlement agreement. In the interest of *does not*  
judicial economy, and to enable the parties to avoid the expense of preparing for and *settle,*  
participating in the settlement conference, the parties respectfully request that the June *I would, of course, schedule a*  
25 settlement conference be adjourned. *prompt settlement conference.*

Two proposed dates for rescheduling this settlement conference are July *W/ Maas,*  
30 and July 31, 2014. This is the first request for an adjournment of the settlement *USMJ,*  
conference and plaintiff's counsel consents to this request. This request does not affect *6/19/14*  
any other scheduled dates in this case.

Additionally, on May 29, 2014 and June 13, 2014, Defendants submitted requests to the Court for permission for Defendant RMI and the insurer, AIG, to appear for the June 25, 2014 settlement conference by telephone, because they do not have a knowledgeable representative within 100 miles of New York City who can participate in the conference in person. The Court granted the request for RMI to appear by telephone




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on May 29, and the request for AIG to appear by telephone is pending before the Court. For the reasons set forth in the May 29 and June 13 requests, Defendants respectfully request that RMI and the representative from AIG be permitted to appear for the adjourned settlement conference by telephone. A representative for Defendant CompassRock will appear in person.

Thank you for your consideration of this matter.

Respectfully submitted,

  
Marjorie B. Kulak

cc: Abdul K. Hassan, Esq.